

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL



**Betsy J. Brady, Esq.**  
Federal Government Affairs  
Vice President

Suite 1000  
1120 20th Street, N.W.  
Washington, DC 20036  
202 457-3824  
FAX 202 457-2545  
EMAIL betbrady@lga.att.com

December 8, 1997

**RECEIVED**

DEC 8 - 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, D.C. 20554

RE: Ex Parte  
CC Dkt. No. 97-208 Applications by BellSouth Telecommunications, Inc. and  
BellSouth Long Distance, Inc. for Provisioning of In-Region, interLATA Service in  
South Carolina.

Dear Ms. Roman Salas:

A copy of the attached document was provided to James Casserly, Senior Legal Advisor to Commissioner Ness on Friday, December 5, 1997.

Two copies of this Notice are being submitted to the secretary of the Federal Communications Commission in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

*Betsy J. Brady*

Attachments

cc: J. Casserly

022

## QUESTIONS RELATING TO PERFORMANCE OF BELL SOUTH'S OSS SYSTEMS

1. LENS is BellSouth's proprietary CLEC pre-ordering interface. LENS is a web-based product that is available to CLECs on-line. Because it is a proprietary product, BellSouth controls all changes made to LENS, when those changes are released and how those changes are communicated to its CLEC customers. For purposes of this demonstration, LENS is *not* the same interface as the LENS which existed on the October 1 filing date for South Carolina. BellSouth has made a significant number of changes to LENS since October 1. Changes to LENS are identified in the "Release Notes" section of the interface. Those Notes identify the changes which BellSouth has made to the interface as well as a date on which BellSouth created the changes. AT&T notes that the dates the changes were created is not necessarily the date on which those changes were made available to CLECs in LENS. For example, the notice and Release Notes on the October 22 changes were not available in LENS' Release Notes section until November 6.

Q: How does BellSouth communicate changes to CLECs on-line in LENS itself? Could you go to the Release Notes section of the interface now? What are the dates in the Release Notes section? Does that mean that BellSouth made changes to the interface on or about those dates?

Q: Does BellSouth have a "Help Desk" for CLEC users of LENS? Does BellSouth keep logs of system outages and complaints received from CLECs on outages and other problems with LENS? Have there been any significant outages problems or complaints from CLECs regarding LENS? Has all of that information been provided in any of BellSouth's applications before the FCC?

2. LENS is BellSouth's proprietary CLEC pre-ordering interface. To obtain pre-ordering information (feature availability, due dates, telephone numbers), a CLEC would use LENS in the "inquiry mode." EDI is BellSouth's primary ordering interface. When a CLEC is placing an order in the EDI interface, the CLEC representative must go back and forth from the LENS interface to the EDI interface to obtain and copy information necessary for the order (that is contained in LENS) and transfer that information over and into the EDI interface. Having to go back and forth between these two interfaces in the ordering process is cumbersome, inefficient and prone to mistakes. Because BellSouth's own retail systems integrate the pre-ordering/ordering stages into a single screen, BellSouth does not experience this problem.

Q: How do BellSouth's customer service representatives place pre-order information, i.e., telephone numbers, into the order process? I've heard CLECs talk about cut and paste and drag and click; do BellSouth's representatives use a cut and paste or drag and click process? Does the OSS BellSouth uses for retail orders automatically place information into the order by the retail ordering system, right?

Q: If the CLEC obtains incorrect information from LENS, e.g., an incorrect or incomplete address, and submits that information as part of the EDI order process, will the order 1) reject; and 2) if so, when in the process will that rejection occur? Will the CLEC know within minutes, hours, or days? How will that notice occur (fax or electronic)?

Q: BellSouth's own service representative does not have to cut and paste information, correct? But if that representative enters incorrect information for a new service, **business** order, when and how does your representative get notified by the retail system of that error – minutes, hours, days? Do BellSouth's representatives receive that information for business orders faster than a CLEC representative receives that information?

**3. BellSouth asserts that CLECs can avoid the cut and paste problem by actually placing the order through LENS in the "firm order mode" (as opposed to the "inquiry mode"). This argument, however, is contrary to BellSouth's stated position that CLECs should use the EDI – and not LENS – to place orders. Further, BellSouth has stated that it is not relying on the LENS ordering capabilities to meet its Section 271 checklist compliance obligations. In any event, LENS as an ordering tool is discriminatory in at least two respects. First, LENS is a proprietary interface created by BellSouth and currently not capable of integration with CLEC ordering systems meaning that CLECs placing orders through LENS must input the same data two times – once into the BellSouth system through the LENS interface and once into the CLEC's internal system. Requiring new entrants to manually input the same information two times doubles the opportunity for errors in the CLEC's orders. BellSouth obviously does not have a dual entry issue at retail. Consequently, BellSouth's recommendation that CLECs use the LENS interface to place orders is both more inefficient and more cumbersome than its own systems and, therefore, and discriminatory. Second, the LENS interface is capable only of handling very simple orders. If, for example, the CLEC customer wanted to add a line for Internet access or a fax machine to an existing account, the CLEC must place that order in the EDI interface. As a result, leaving aside the inefficient and discriminatory nature of BellSouth's recommendation, it would only apply to some of the orders placed by a CLEC. For more complex orders, it is not a solution at all.**

Q: Can the language in which LENS is written, which I understand is a proprietary system, be translated into something compatible with the EDI interface? Have you provided to CLECs a dictionary which translates LENS' language into an EDI-compatible language? Have any CLECs implemented a system which performs that translation and have you conducted any testing of such a system if one exists?

Q: What if one of the CLEC's customers, at the time of placing a new service order wants to add a second or third line or has a more complex order than a simple migration, can that order be placed through LENS or does the CLEC have to place that order in the EDI interface?

**4. The order rejection process under EDI is discriminatory. While BellSouth retail representatives receive immediate notification of all errors, both fatal (such as data format errors) and non-fatal (such as incorrect USOC codes), CLEC orders are not treated the same way. Instead, BellSouth has committed to provide notice of order rejections on a one hour basis. Further, BellSouth has contractually agreed to provide those notices *electronically* by March 31, 1997. However, BellSouth has not implemented electronic order rejection to date and has not indicated when this capability might be met. In any event, as explained in the affidavit of AT&T witness Michael Pfau, BellSouth data indicates that using manual processes, BellSouth has met the one hour notice requirement only 6%**

**of the time. Generally, rejection notices have been provided between 24-48 hours after input. Ameritech did provide electronic notice of order rejection.**

Q: If a CLEC enters an incorrect USOC into EDI while placing a new service order, when will it get notification that it has input an incorrect USOC and what is the form of that notification? Doesn't the performance data submitted by BellSouth in this case demonstrate that BellSouth meets its one hour notice commitment for order rejections only 6% of the time.

Q: What procedure does BellSouth use with CLECs to help the CLECs analyze its order input accuracy so that the CLEC can correct its problems? Does BellSouth have an efficiency improvement plan to maximize the number of "good orders" input by CLECs?

Q: If a business retail representative enters an incorrect USOC code for a new business customer order, how soon does the retail system tell the BellSouth representatives that they have input an incorrect USOC and what form does that notice take? Does the BellSouth OSS make the correction for the BellSouth representative or does the representative have to do a table search of all of the USOCs to find the correct USOC? If the BellSouth representative does a table search, are there shortcuts available or does the representative have to scroll through all of the USOCs from the beginning of the list?

Q: If a CLEC enters a fatal edit error, hard data error, or a format error (which should be synonymous terms), when will it get notice of that error and what form will that notice take? If that same order from the CLEC contains a format error *and* an incorrect USOC, will the CLEC get notified of both errors at the same time or will it get notice of the format error first and the USOC error only when it resubmits the order? If the error is an incorrect USOC, does the CLEC representative have to do a table search of all of the USOCs to find the correct USOC? If the CLEC representative does a table search, are there shortcuts available or does the representative have to scroll through all of the USOCs from the beginning of the list?

Q: If a BellSouth business retail sales representative enters a business customer's new service order with both a format error and an incorrect USOC code, when will that sales representative get notified of both of those errors?

**5. When a CLEC places an order in the EDI interface, it must obtain due dates and telephone numbers from LENS (in the pre-order, inquiry mode) and then transfer information from LENS to the EDI interface; thereby working simultaneously between the two interfaces. For available due dates, LENS provides the CLEC with information from which the CLEC representative may manually calculate an estimated due date. That process is discriminatory in three ways. First, the LENS system only provides schedule parameters and information which the CLEC representative must use to manually calculate a due date. BellSouth's retail systems, on the other hand, electronically calculate the first available due date for the BellSouth representative. Second, the CLEC customer's estimated due date is not confirmed and reserved until the order hits BellSouth's system and is accepted. With a BellSouth retail customer, the BellSouth representative reserves the due date as soon as the order is released into the system. Finally, BellSouth representatives can request any four hour interval and be immediately notified if that**

**interval is available. A CLEC may only request AM or PM, and is not notified if that request was granted until a firm order confirmation is issued, usually the next day.**

Q: Does LENS in the "inquiry mode" electronically calculate due dates or does it provide information from which the CLEC representative calculates due dates?

Q: Do BellSouth's retail systems electronically calculate first available date for the BellSouth representative? Why isn't the CLEC representative given parity access to the BellSouth OSS that calculates due dates?

Q: Can a CLEC using LENS in the "inquiry mode" actually reserve a due date, or are the CLECs only able to calculate an estimated date that is not finalized and actually reserved by BellSouth until the EDI order enters the BellSouth system and has been confirmed and accepted by BellSouth's systems? If a CLEC uses LENS in the firm order mode, is the due date confirmed and actually reserved when the CLEC releases the order?

Q: At retail, are due dates reserved in the BellSouth systems when the representative releases the order at some later point in time?

Q: Can BellSouth retail representatives request 4 hour intervals for due date? When is that time and date confirmed?

Q: Can CLEC representatives reserve due dates and times in the same manner?

**6. AT&T has presented testimony on BellSouth's failure to provide adequate advance notice of changes which it has made to LENS. In addition, AT&T has complained of the lack of support BellSouth has provided in advance to AT&T to train its representatives on the changes which BellSouth has made to LENS. In some occasions, AT&T has discovered changes made to LENS before *any* notice has been given, leading to significant order rejections. Internally, BellSouth communicates systems changes to its personnel prior to making those changes in the system.**

Q: How much advance notice does BellSouth give to CLECs prior to making changes in LENS? How does BellSouth provide that notice? What kind of training materials are made available to CLECs to permit retraining of CLEC personnel on these new releases? How soon in advance of systems changes has that information been provided?

Q: With respect to BellSouth's retail operations, what is BellSouth's existing policy on how much advance internal notice is given before making systems changes in BellSouth's ordering systems? What is BellSouth's policy on the advance availability of training materials for systems changes?